

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

September 19, 2022

VIA ECF

Honorable J. Paul Oetken
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Re: USA v. Hernandez Yaneris
22 Cr. 439 (JPO)

Honorable Judge Oetken:

With the consent of the Government and the Pretrial Services Agency, I write to respectfully request that the Court modify Ms. Hernandez's bail conditions. Specifically, I request that the Court allow Ms. Hernandez to travel to the District of New Jersey for medical appointments. Ms. Hernandez has a consultation for a medical procedure on September 22, 2022. Following this consultation, she is expected to have follow up appointments for a medical procedure at the same clinic in New Jersey. I write to request that Ms. Hernandez be permitted to travel to New Jersey for medical appointments.

On November 16, 2021, Ms. Hernandez was released on her own recognizance. Magistrate Judge Lehrburger endorsed a bail modification request for Ms. Hernandez to travel to New Jersey on January 3, 2022. Magistrate Judge Aaron endorsed a bail modification request for Ms. Hernandez to travel to Florida on November 24, 2021. Magistrate Judge Debra Freeman endorsed a bail modification request for Ms. Hernandez to travel to New Jersey on November 30, 2021. Magistrate Judge Lehrburger endorsed a bail modification to allow Ms. Hernandez to travel freely to the Southern District of Florida on March 14, 2022. Magistrate Judge Lehrburger endorsed another bail modification request for Ms. Hernandez to travel to Connecticut on May 27, 2022. As noted above, we have been in touch with Pretrial Officer Stephen Boose and AUSA Kevin Mead in this case neither object to this travel request.

Thank you for your consideration of this matter.

Respectfully submitted,

Zawadi Baharanyi
Assistant Federal Defender
917-612-2753

SO ORDERED:



J. PAUL OETKEN
United States District Judge

cc: AUSA Kevin Mead

September 19, 2022